

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, JESSICA PAN, EMILY
KIM, MIGUEL BARRETO, and BRETT
MENZIES FOLKINS, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

C.A. No. 1:23-cv-00441-TMH

**PLAINTIFFS' MOTION TO PROVISIONALLY SEAL ACCOMPANYING
EXHIBITS TO NOTICE OF ADDITIONAL
SUPPLEMENTAL AUTHORITY**

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Attorneys for Plaintiffs

Pursuant to this Court's Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Plaintiffs hereby move to provisionally seal a number of exhibits that will accompany a Notice of Additional Supplemental Authority (attached hereto as Exhibit A). The Notice of Additional Supplemental Authority will be publicly filed, but Plaintiffs request that the exhibits that will accompany the Notice (attached hereto as Exhibit B-H) remain under seal.

The Notice of Supplemental Authority informs the Court of additional arbitration awards (Exhibit B-H) that Plaintiffs' counsel have obtained on behalf of former Twitter employees who brought claims against Twitter in arbitration that are the same claims brought by the Plaintiffs in this case.

Because Twitter takes the position that arbitration awards are confidential, Plaintiffs have filed the awards themselves under seal. As the arbitration awards contain some personally identifying information, if the Court is disinclined to permit the entirety of the documents to be filed under seal, Plaintiffs respectfully request the opportunity to submit a redacted version removing identifying information for the claimants referenced in the arbitration awards.

Dated: March 21, 2025

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, JESSICA PAN, EMILY KIM,
MIGUEL BARRETO, and BRETT
MENZIES FOLKINS, on behalf of
themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

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CERTIFICATE OF SERVICE

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record for Defendant via filing on the Court's CM/ECF system and that Plaintiffs have served the sealed version of this document on Defendant's counsel via email on March 21, 2025.

/s/ Kate Butler
Kate Butler